

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION

FILED
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U.S. DISTRICT COURT
SOUTHERN DISTRICT OHIO
WESTERN DIV. DAYTON

UNITED STATES OF AMERICA, : CASE NO.

Plaintiff, :

3 22 cr 003

v. :

CAMREN JAMES EDMONDSON, (1)
(COUNTS 1 - 40)

INDICTMENT

18 U.S.C. § 371

18 U.S.C. § 924(a)(1)(A)

MICHAEL J. NEWMAN

GABRIEL IRWIN JOHNSON, (2)
(COUNT 1)

FORFEITURE

Defendants. :

THE GRAND JURY CHARGES THAT:

COUNT 1
[18 U.S.C. § 371]
(Conspiracy)

From on or about January 19, 2018 and continuing through on or about December 18, 2020, both dates being approximate and inclusive, while in the Southern District of Ohio and elsewhere, defendants **CAMREN JAMES EDMONDSON** and **GABRIEL IRWIN JOHNSON**, together with other individuals, both known and unknown to the Grand Jury, did knowingly, willfully and unlawfully combine, conspire, confederate and agree by and between themselves to accomplish a common unlawful plan, scheme and artifice to commit certain offenses against the United States to include: making false and fictitious written statements to federally licensed firearms dealers (hereinafter referred to as federal firearms licensees or "FFLs") in connection with the acquisition of firearms in violation of 18 U.S.C. §§ 922(a)(6) and 924(a)(2); making false statements and representations to FFLs in connection with the purchase of firearms in violation of 18 U.S.C. §

924(a)(1)(A); and engaging in the business of dealing in firearms without a federal license in violation of 18 U.S.C. § 922(a)(1)(A).

OBJECTS OF THE CONSPIRACY

It was an object of the conspiracy for the conspirators to illegally acquire, purchase, possess, use and otherwise traffic in firearms which had illicitly and fraudulently been acquired and purchased from FFLs through so-called “straw purchasers.”

It was further an object of the conspiracy for the conspirators to submit false and otherwise fraudulent Firearms Transaction Records (ATF Form 4473) to various FFLs located throughout the Greater Dayton, Ohio Area in connection with the purchase and acquisition of firearms.

It was further an object of the conspiracy for defendant **CAMREN JAMES EDMONDSON** to complete, execute and submit various ATF Form 4473s to various FFLs located throughout the Greater Dayton, Ohio Area wherein he made materially false statements and representations to include answering “yes” to the question appearing on said form, to wit: “Are you the actual transferee/buyer of the firearm(s) listed on this form;” knowing at the time that was false.

It was further an object of the conspiracy for the conspirators to directly and indirectly traffic firearms to third parties, some of which included individuals who had been disqualified under state and/or federal law from acquiring and/or possessing firearms.

It was further an object of this conspiracy for the conspirators to conceal, disguise and insulate their respective roles in carrying out aforesaid criminal scheme from federal and state regulatory authorities, law enforcement authorities and prosecution authorities.

It was further an object of this conspiracy for the conspirators to enjoy the financial benefits and profits generated from their illicit follow-on sales of firearms to third parties.

MANNER AND MEANS

During all times relevant to Count 1 of this Indictment, defendant **GABRIEL IRWIN JOHNSON** was legally prohibited from acquiring and/or possessing firearms under Federal law.

During all times relevant to Count 1 of this Indictment, defendant **CAMREN JAMES EDMONDSON** was legally permitted to acquire and possess firearms.

During the timeframe of the charged conspiracy, defendant **GABRIEL IRWIN JOHNSON** solicited defendant **CAMREN JAMES EDMONDSON** to purchase miscellaneous firearms from Dayton-Area FFLs on his behalf.

During the timeframe of the charged conspiracy, defendant **GABRIEL IRWIN JOHNSON** provided defendant **CAMREN JAMES EDMONDSON** with cash to purchase firearms from Dayton-Area FFLs on his behalf.

During the timeframe of the charged conspiracy, defendant **GABRIEL IRWIN JOHNSON** would accompany defendant **CAMREN JAMES EDMONDSON** into various Dayton-Area FFL retail establishments whereupon defendant **CAMREN JAMES EDMONDSON** would serve as a straw purchaser of firearms.

During the timeframe of the charged conspiracy, defendant **CAMREN JAMES EDMONDSON** completed, executed and submitted various ATF Form 4473s to FFLs which contained materially false statements and representations to include answering “yes” to the question appearing on said form, to wit: “Are you the actual transferee/buyer of the firearm(s) listed on this form;” knowing at the time that was false.

Following completion of aforesaid firearm purchases, defendant **CAMREN JAMES EDMONDSON** turned over possession of the recently purchased firearms to defendant **GABRIEL IRWIN JOHNSON** for subsequent resale to third parties, some of which were prohibited persons.

During the timeframe of the charged conspiracy, defendants **GABRIEL IRWIN JOHNSON** and **CAMREN JAMES EDMONDSON** shared the criminal proceeds generated by the re-sale of aforesaid illicitly acquired firearms.

OVERT ACTS

In furtherance of this conspiracy, and to effect the objects thereof, at least one of the conspirators committed one of the following overt acts while in the Southern District of Ohio:

- a. On or about January 19, 2018, defendant **CAMREN JAMES EDMONDSON** served as a “straw purchaser” for an unnamed third person wherein he knowingly made, completed and submitted to C.G. at RK Holdings LLP, 1476 Upper Valley Pike, Springfield, Ohio 45504 an ATF Form 4473 which falsely and unlawfully represented that he was the actual transferee/buyer of a Taurus 9mm pistol listed on the form.
- b. On or about January 27, 2018, defendant **CAMREN JAMES EDMONDSON** served as a “straw purchaser” for an unnamed third person wherein he knowingly made, completed and submitted to L.H. at Wild Boar Guns, 9230 County Road 2, West Mansfield, Ohio 43358 an ATF Form 4473 which falsely and unlawfully represented that he was the actual transferee/buyer of a Jimenez 9mm pistol listed on the form.
- c. On or about December 21, 2018, defendant **CAMREN JAMES EDMONDSON** served as a “straw purchaser” for an unnamed third person wherein he knowingly made, completed and submitted to A.D. at Olde English Outfitters, 480 E. Ginghamburg Road, Tipp City, Ohio 45371 an ATF Form 4473 which falsely and unlawfully represented that he was the actual transferee/buyer of a Glock .40 Cal. pistol listed on the form.
- d. On or about April 22, 2020, defendant **CAMREN JAMES EDMONDSON** served as a “straw purchaser” for an unnamed third person wherein he knowingly made, completed and submitted to D.B. at Gander Outdoors 690, 8001 Old Troy Pike, Huber Heights, Ohio 45424 an ATF Form 4473 which falsely and unlawfully represented that he was the actual transferee/buyer of a Glock .45 Cal. pistol listed on the form.
- e. On or about August 1, 2020, defendant **CAMREN JAMES EDMONDSON** served as a “straw purchaser” for an unnamed third person wherein he knowingly made, completed and submitted to J.S. at the Miami Armory, 8945 Kingsridge Dr., Dayton, Ohio 45458 an ATF Form 4473 which falsely and unlawfully represented that he was the actual transferee/buyer of a Taurus .40 Cal. pistol, a Kahr .40 Cal. pistol and a Armscor/RIA .38 Cal. pistol all listed on the form.

- f. On or about October 30, 2020, defendant **GABRIEL IRWIN JOHNSON** sent defendant **CAMREN JAMES EDMONDSON** a text message which stated in part: “Fr fr tho we could run up some [expletive deleted] today at the store if we can find a good AR and a cheap .40 like A smith or Taurus and maybe a glock I got some bread but I’ll out for both of us on these flips fr cause I’m bouta tax tf out these white boys.”
- g. On or about November 1, 2020, defendant **CAMREN JAMES EDMONDSON** sent defendant **GABRIEL IRWIN JOHNSON** a text message which stated in part: “40 wit a extension on it for sale.”
- h. On or about November 22, 2020, defendant **GABRIEL IRWIN JOHNSON** sent defendant **CAMREN JAMES EDMONDSON** a text message which stated in part: “Who got a strap rq.”
- i. On or about November 24, 2020, defendant **CAMREN JAMES EDMONDSON** sent defendant **GABRIEL IRWIN JOHNSON** a text message which stated in part: “They need \$7 or better for a Glock.”

All in violation of Title 18, United States Code, Section 371.

COUNTS 2-27
[18 U.S.C. § 924 (a)(1)(A)]
(False Statement During the Purchase of Firearm)

On or about the following listed dates, in the Southern District of Ohio, and elsewhere within the jurisdiction of this Court defendant **CAMREN JAMES EDMONDSON**, knowingly made false statements and representations to the following listed sales representatives of Olde English Outfitters, 480 E. Ginghamburg Road, Tipp City, Ohio 45371, a FFL, each of whom were licensed under the provisions of Chapter 44, Title 18, United States Code, with respect to information required by the provisions of Chapter 44, Title 18, United States Code, to be kept in the records of Olde English Outfitters, 480 E. Ginghamburg Road, Tipp City, Ohio, in that Defendant did complete and execute on an ATF Form 4473, in connection with the purchase of a firearm, causing a false statement and representation to be made in the Firearms Transaction Record by answering “yes” to the following question, to wit: “Are you the actual transferee/buyer of the firearm(s) listed on this form;” knowing at the time that it was false.

<u>COUNT</u>	<u>DATE</u>	<u>FFL SALES REP</u>	<u>FIREARM(S) PURCHASED</u>
2	1/30/18	A.D.	Springfield Armory 9mm Pistol
3	2/5/18	A.D.	S&W 9mm Pistol and a S&W .40 Caliber Pistol
4	7/27/18	J.A.	Taurus 9mm Pistol
5	12/21/18	A.D.	Glock .40 Caliber Pistol
6	3/19/19	S.R.	Taurus 9mm Pistol
7	4/6/19	D.B.	Springfield Armory 9mm Pistol
8	6/21/19	S.R.	S&W .40 Caliber Pistol and a Taurus 9mm Pistol
9	9/17/19	S.R.	Taurus 9mm Pistol
10	12/9/19	S.R.	Taurus 9mm Pistol
11	2/5/20	W.E.	Taurus 9mm Pistol
12	4/23/20	S.R.	Taurus 9mm Pistol
13	5/20/20	R.G.	S&W 9mm Pistol and a Taurus .40 Caliber Pistol
14	7/2/20	J.A.	Taurus 9mm Pistol
15	7/23/20	W.E.	Two (2) Taurus 9mm Pistols
16	8/5/20	A.D.	SCCY 9mm Pistol
17	8/5/20	A.D.	Three (3) Glock .40 Caliber Pistols
18	8/10/20	D.S.	Two (2) Glock .40 Caliber Pistols
19	8/12/20	D.S.	Glock .40 Caliber Pistol
20	8/22/20	D.S.	Glock 9mm Pistol
21	9/21/20	R.C.	Glock .45 Caliber Pistol, Glock .40 Caliber Pistol and a Taurus 9mm Pistol

22	9/23/20	R.G.	Springfield Armory 9mm Pistol
23	9/29/20	S.R.	Two (2) Taurus 9mm Pistols and a S&W 9mm Pistol
24	10/6/20	W.E.	Two (2) Glock .40 Caliber Pistols
25	10/10/20	T.D.	Glock 9mm Pistol
26	10/10/20	R.G.	Glock .40 Caliber Pistol
27	10/19/20	S.R.	Springfield Armory 9mm Pistol

All in violation of Title 18, United States Code, Section 924(a)(1)(A).

COUNTS 28-34
[18 U.S.C. § 924 (a)(1)(A)]
(False Statement During the Purchase of Firearm)

On or about the following listed dates, in the Southern District of Ohio, and elsewhere within the jurisdiction of this Court defendant **CAMREN JAMES EDMONDSON**, knowingly made false statements and representations to the following listed sales representatives of Gander Outdoors 690, 8001 Old Troy Pike, Huber Heights, Ohio 45424, a FFL, each of whom were licensed under the provisions of Chapter 44, Title 18, United States Code, with respect to information required by the provisions of Chapter 44, Title 18, United States Code, to be kept in the records of Gander Outdoors 690, 8001 Old Troy Pike, Huber Heights, Ohio 45424, in that Defendant did complete and execute on an ATF Form 4473, in connection with the purchase of a firearm, causing a false statement and representation to be made in the Firearms Transaction Record by answering “yes” to the following question, to wit: “Are you the actual transferee/buyer of the firearm(s) listed on this form;” knowing at the time that it was false.

<u>COUNT</u>	<u>DATE</u>	<u>FFL SALES REP</u>	<u>FIREARM PURCHASED</u>
28	4/22/20	D.B.	Glock .45 Caliber Pistol

29	8/3/20	K.S.	Glock .40 Caliber Pistol
30	9/22/20	J.P.	S&W .40 Caliber Pistol
31	10/30/20	D.B.	Glock 9x 19mm Pistol
32	10/31/20	D.B.	S&W .40 Caliber Pistol
33	11/22/20	D.B.	Taurus 9mm Pistol
34	12/4/20	R.W.	Taurus 9mm Pistol

All in violation of Title 18, United States Code, Section 924(a)(1)(A).

COUNTS 35 - 37
[18 U.S.C. § 924 (a)(1)(A)]
(False Statement During the Purchase of Firearm)

On or about the following listed dates, in the Southern District of Ohio, and elsewhere within the jurisdiction of this Court defendant **CAMREN JAMES EDMONDSON**, knowingly made false statements and representations to C.G., a sales representative of RK Holdings LLP, 1476 Upper Valley Pike, Springfield, Ohio 45504, a FFL, who was licensed under the provisions of Chapter 44, Title 18, United States Code, with respect to information required by the provisions of Chapter 44, Title 18, United States Code, to be kept in the records of RK Holdings LLP, 1476 Upper Valley Pike, Springfield, Ohio 45504, in that Defendant did complete and execute on an ATF Form 4473, in connection with the purchase of a firearm, causing a false statement and representation to be made in the Firearms Transaction Record by answering “yes” to the following question, to wit: “Are you the actual transferee/buyer of the firearm(s) listed on this form;” knowing at the time that it was false.

<u>COUNT</u>	<u>DATE</u>	<u>FFL SALES REP</u>	<u>FIREARM PURCHASED</u>
35	1/19/18	R.D.	Taurus 9mm Pistol

36	1/24/18	C.G.	Taurus 9mm Pistol
37	2/25/18	C.G.	S&W 9mm Pistol

All in violation of Title 18, United States Code, Section 924(a)(1)(A).

COUNTS 38 - 39
[18 U.S.C. § 924 (a)(1)(A)]
(False Statement During the Purchase of Firearm)

On or about the following listed dates, in the Southern District of Ohio, and elsewhere within the jurisdiction of this Court defendant **CAMREN JAMES EDMONDSON**, knowingly made false statements and representations to L.H. a sales representative of Wild Boar Guns, 9230 County Road 2, West Mansfield, Ohio 43358, a FFL, who was licensed under the provisions of Chapter 44, Title 18, United States Code, with respect to information required by the provisions of Chapter 44, Title 18, United States Code, to be kept in the records of Wild Boar Guns, 9230 County Road 2, West Mansfield, Ohio 43358, in that Defendant did complete and execute on an ATF Form 4473, in connection with the purchase of a firearm, causing a false statement and representation to be made in the Firearms Transaction Record by answering “yes” to the following question, to wit: “Are you the actual transferee/buyer of the firearm(s) listed on this form;” knowing at the time that it was false.

<u>COUNT</u>	<u>DATE</u>	<u>FFL SALES REP</u>	<u>FIREARM PURCHASED</u>
38	1/27/18	L.H.	Jimenez 9mm Pistol
39	1/28/18	L.H.	S&W MP40 Pistol

All in violation of Title 18, United States Code, Section 924(a)(1)(A).

COUNT 40
[18 U.S.C. § 924 (a)(1)(A)]
(False Statement During the Purchase of Firearm)

That on or about the following listed dates, in the Southern District of Ohio, and elsewhere within the jurisdiction of this Court **CAMREN JAMES EDMONDSON**, defendant herein, knowingly made a false statement and representation to J.S. a sales representative of the Miami Armory, 8945 Kingsridge Dr., Dayton, Ohio 45458, a FFL, who was licensed under the provisions of Chapter 44, Title 18, United States Code, with respect to information required by the provisions of Chapter 44, Title 18, United States Code, to be kept in the records of the Miami Armory, 8945 Kingsridge Dr., Dayton, Ohio 45458, in that Defendant did complete and execute on an ATF Form 4473, in connection with the purchase of a firearm, causing a false statement and representation to be made in the Firearms Transaction Record by answering “yes” to the following question, to wit: “Are you the actual transferee/buyer of the firearm(s) listed on this form;” knowing at the time that it was false.

<u>COUNT</u>	<u>DATE</u>	<u>FFL SALES REP</u>	<u>FIREARM(S) PURCHASED</u>
40	8/1/20	J.S.	Taurus .40 Caliber Pistol, Kahr .40 Caliber Pistol and a Armscor/RIA .38 Caliber Revolver

All in violation of Title 18, United States Code, Section 924(a)(1)(A).

FORFEITURE

Upon conviction of any offense set forth in Counts 1 through 40 of this Indictment, defendants **CAMREN JAMES EDMONDSON** and **GABRIEL IRWIN JOHNSON** shall forfeit to the United States, pursuant to 18 U.S.C. § 924(d)(1) and 28 U.S.C. § 2461(c), any firearms and ammunition involved in or used in such violation(s).

SUBSTITUTE ASSETS

If any of the property described above, as a result of any act or omission of the defendants:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

it is the intent of the United States, pursuant to 21 U.S.C. § 853(p), as incorporated by 28 U.S.C. § 2461(c), to seek forfeiture of any other property of the defendants, up to the value of the property described above.

A TRUE BILL

1.51
FOREPERSON

KENNETH L. PARKER
United States Attorney

Dwight K. Keller
DWIGHT K. KELLER
Assistant United States Attorney